

UNITED STATES DISTRICT COURT  
for the  
Eastern District of Michigan

United States of America

v.

Maurice Knighten

Case No. 2:22-mj-30155  
Judge: Unassigned,  
Filed: 03-24-2022

**CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of November 18, 2021 in the county of Jackson in the  
Eastern District of Michigan, the defendant(s) violated:

*Code Section*  
18 U.S.C. § 922(g)(1)

*Offense Description*  
Possession of a firearm by a convicted felon

This criminal complaint is based on these facts:  
see attached affidavit.

☒ Continued on the attached sheet.

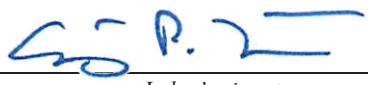
Sworn to before me and signed in my presence  
and/or by reliable electronic means.

Date: March 24, 2022

City and state: Detroit, Michigan

  
Complainant's signature

George Bingham, Special Agent (ATF)  
Printed name and title

  
Judge's signature

Hon. Anthony P. Patti, United States Magistrate Judge  
Printed name and title

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

MAURICE KNIGHTEN,

Defendant.

*Filed Under Seal*

**AFFIDAVIT IN SUPPORT OF APPLICATION FOR  
CRIMINAL COMPLAINT AND ARREST WARRANT**

I, George Bingham, being first duly sworn, hereby depose and state as follows:

**INTRODUCTION AND AGENT BACKGROUND**

1. I am employed as a Special Agent with the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF). I am currently assigned to the Detroit Field Division, Ann Arbor Office, where I am responsible for investigating violations of firearms laws, among other crimes. I have been employed with the ATF for approximately 12 years. Prior to this, I was a Michigan State Police (MSP) Trooper for approximately 11 years. During my time in law enforcement, I have participated in numerous investigations involving firearms, narcotics trafficking, violent crimes, and criminal street gangs. These investigations have

resulted in the execution of state and federal search and arrest warrants. In addition, I have gained experience investigating the use of cellular devices to commit criminal offenses.

2. This affidavit is based upon information I have gained from my investigation, information provided by law enforcement officers and others who have personal knowledge of the events and circumstances described herein, and my training and experience. This affidavit is intended to show merely that there is sufficient probable cause for the requested complaint and arrest warrant and does not set forth all details or facts that exist pertaining to the investigation.

3. This affidavit provides information necessary to establish probable cause that Maurice KNIGHTEN (D.O.B.: XX/XX/1998) knowingly and intentionally possessed a FN 57 5.56mm pistol in violation of 18 U.S.C. § 922(g)(1) – Possession of a Firearm by a Convicted Felon.

#### **PROBABLE CAUSE**

4. On or about November 18, 2021, at approximately 3:58 a.m., Jackson County Sheriff Deputy Barlund stopped a 2009 Pontiac Torrent because its driver's-side brake light was not functioning. Deputy Barlund activated his overhead lights and the car pulled into the driveway of a residence on Adrian Court in Jackson, MI.

5. KNIGHTEN was the driver and lone occupant of the car. KNIGHTEN only provided the deputy a Michigan identification card. Deputy Barlund also noted that he could smell a strong odor of alcohol on KNIGHTEN's breath. A check of the Law Enforcement Information Network (LEIN) showed that KNIGHTEN's driver's license was suspended. Deputy Barlund placed KNIGHTEN in handcuffs and arrested him for driving with a suspended driver's license. KNIGHTEN did not reside at the Adrian Court address.

6. Deputy Barlund called for a tow truck and conducted an inventory search of the car. The deputy located a FN 57 5.56mm pistol underneath the back of the passenger side front seat with the grip handle closest to the driver seat, making it easily accessible to KNIGHTEN. The pistol contained seventeen rounds of 5.56 ammunition, and its serial number was ground down to the metal and illegible. Under the rear seat, Deputy Barlund located an open, half-full bottle of Remy Martin alcohol. KNIGHTEN's phone was also found in the car.

7. The registered owner of the Torrent was contacted, and she stated that KNIGHTEN had permission to use the car. The registered owner confirmed that she did not own any firearms and that there were no firearms in the car when she last was inside of it earlier that day.


8. SA Bingham conducted a criminal history check on KNIGHTEN and learned that he has the following felony conviction: 2015 - Felony Firearm - 4<sup>th</sup> Circuit Court, Jackson, Michigan. As a result of this conviction, KNIGHTEN was sentenced to 24 months in the Michigan Department of Corrections. It is therefore likely that he knew he was a convicted felon and prohibited from possessing firearms.

9. Special Agent Bingham spoke with ATF interstate firearms nexus expert Special Agent Mike Parsons who confirmed that the FN 57 pistol was manufactured outside the State of Michigan and thereby travelled in or affected interstate commerce.

### **CONCLUSION**

10. Probable cause exists that, on or about November 18, 2021, in the Eastern District of Michigan, Maurice KNIGHTEN (D.O.B.: XX/XX/1998) knowingly possessed the above-described firearm in violation of 18 U.S.C. § 922(g)(1).

Respectfully submitted,

  
George Bingham, Special Agent  
Bureau of Alcohol, Tobacco,  
Firearms and Explosives

Sworn to before me and signed in  
my presence and/or by reliable electronic means.

A handwritten signature in blue ink, appearing to read "A. P. Patti", is positioned above a horizontal line.

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HON. ANTHONY P. PATTI  
UNITED STATES MAGISTRATE JUDGE

Date: March 24, 2022